

# Consideration of Comments for Two Eagle

## Scoping Period

The Scoping period for the Two Eagle Vegetation Management Project started on 11/22/2017. While comments may be submitted at any time, for the purposes of this scoping period, comments were accepted through 12/29/2017.

## Parties Responding to Scoping

**Table 1: Parties that Responded**

<b>Name</b>	<b>Acronym</b>	<b>Project File Document Name</b>
Baker County	BaCo	20171229_TE_BaCo_ScopingComments
American Forest Resource Council	AFRC	20171229_TE_AFRC_ScopingComments
Boise Cascade	BOI	20171229_TE_BoiseCascade_ScopingComments
Greater Hells Canyon Council	GHCC	20171219_TE_GHCC_ScopingComments
Oregon Department of Fish and Wildlife	ODFW	20171219_TE_ODFW_ScopingComments
Oregon Wild	OW	20171226_TE_OW_ScopingComments
Dick Artley	DA	20171222_TE_Artley_ScopingComments
Glenn Jorgensen	GJ	20171211_TE_GJ_ScopingComment

## Comment Analysis & Response

Comments were reviewed by the interdisciplinary team (ID team) to determine if issues or concerns were raised that demonstrated a clear cause-effect relationship and if recommendations/remedies were suggested that would address the issue/concern. Issues raised by multiple parties are listed once. If comments were supportive in nature and provided no issues/concerns or recommendations, they are not analyzed further in this document but are included in the project record.

**Table 2: Comment Analysis & Response**

ISSUE/CONCERN (PARTY/IES ACRONYM)	RECOMMENDATION/ SUGGESTED REMEDY	RESPONSE	REMARKS AND/OR PROJECT RECORD CITATIONS
<b>Economics</b>			
Sale Viability of proposed treatments (BaCo) (BOI)	Design profitable sales, including cutting over 21" white fir	Comment considered but no changes needed	
Biomass utilization (BaCo)	Analyze for biomass reduction if market develops	Additional alternatives developed and evaluated	Alternative 2M was developed in response to this comment
Non-commercial thinning is not the most cost-effective treatment (BaCo)	Analyze for mastication on slopes <35%	Comment considered but no changes needed	
P&N (AFRC)	Would like to see economic viability and support to local infrastructure added	Comment considered but no changes needed	This is already included in the P&N
LMZ (BOI)	Analyze for LMZ to improve timber outputs in appropriate areas	Comment considered but no changes needed	
Viability of project area (AFRC) (BOI)	Increase project boundary and find ways to design for current market	Additional alternatives developed and evaluated	Biomass units were analyzed in response to economic concerns and can be found in alternative 2m. Expanding the project boundary was not considered, as the northern boundary is near the Boulder Park IRA.
Skyline yarding is expensive (AFRC)	Ensure sufficient volume to support sale	Comment considered but no changes	

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		needed	
<b>Treatment in OFMS and Moist stands</b>			
Moist stands more susceptible to disturbance (BaCo)	Treat more aggressively to reduce disturbance threat	Other - See Remarks	Treatments in moist include HTH and HIM
OFSS deficient on landscape (AFRC) (BOI)	Convert OFMS to OFSS	Comment considered but no changes needed	Treatments already included in proposed action to move dry OFMS to OFSS
OFMS (GHCC) (OW)	Develop an alternative to maintain and enhance all OFMS	Additional alternatives developed and evaluated	Alternative 3 was developed to reduce treatments to promote OFMS to OFSS on dry sites
<b>RHCA Treatments</b>			
Riparian areas are overstocked (BaCo) (AFRC) (BOI)	Log upland RHCAs and drop trees in true riparian habitats	Proposed action modified	Harvest is proposed in three units within RHCAs to promote cottonwood growth. Non-commercial thinning in meadows was identified as an opportunity to improve habitat for mule deer in RHCAs.
Mule deer fawning habitat (ODFW)	Increase understory forage component and transition habitat	Additional alternatives developed and evaluated	Alt 2M and meadow restoration
Conifer encroachment in cottonwood stands (AFRC)	Supports conifer removal	Comment considered but no changes needed	Thank you for your support of this proposed treatment
<b>Transportation and Forest Access</b>			
No roads should be permanently closed (BaCo)	Use gates or seasonal closures	Analysis supplemented, improved or modified	Three gates were identified in areas with wildlife habitat concern or areas with. Other roads identified for closure and decommissioning are either already grown in or causing resource damage.

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System and non-system roads (GHCC)	Analyze impacts of system and non-system roads on soils, wildlife, aquatic and other resources	Literature/science considered	
Non-system road closures (ODFW)	Physically close all new roads created by the project	Comment considered but no changes needed	No new system roads are proposed. All temp roads will be returned to standards outlined by the regional soils guidelines
Temp roads (GHCC) (OW)	Analyze an alternative that does not include temp roads	Additional alternatives developed and evaluated	Alternative E was developed, but not considered for detailed analysis
Temp roads (OW)	Rank new road segments according to cost/benefit	Comment considered but no changes needed	Existing non-system roads used whenever possible
Travel Rule (GHCC)	Decision should include closure of cross country travel within the project area	Comment considered but no changes needed	
Temp roads (BOI)	Analyze in a way that shows how impacts are spread out through time	Analysis supplemented, improved or modified	
WW Travel Analysis Report (GHCC) (ODFW)	Close and/or decommission roads within the project area that are identified as unneeded	Comment considered but no changes needed	
<b>NEPA</b>			
Not using NEPA efficiencies (AFRC) (BOI)	Use HFRA authorities	Comment considered but no changes needed	HFRA would not buy much in the NEPA process. With the complexity level of treatments in WSR we felt it prudent to stay the course with a traditional EA.
NEPA compliance (GHCC)	Analyze direct, indirect and cumulative effects for soils,	Analysis supplemented,	Cumulative effects will be summarized and disclosed in an appendix and discussed in more detail in specialist reports.

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	MIS, ESA, RHCAs,	improved or modified	Mitigations are located in the constraints and mitigation section of the EA and disclosed in respective specialist reports.
Consider reasonable range of alternatives (GHCC)	Develop an alternative that responds to each of the issues raised in this letter	Analysis supplemented, improved or modified	
Management areas (BOI)	Identify MAs and goals of each to compare to align with forest plan in analysis	Comment considered but no changes needed	
<b>Wildlife</b>			
Use best available science (GHCC)	Analyze elk security using distance band approach	Comment considered but no changes needed	
Snags (GHCC) (OW)	Request a robust analysis of existing snags and effects of alternatives	Comment considered but no changes needed	
Connectivity (GHCC)	Take a hard look at connectivity and permeability and review effects to fragmentation	Comment considered but no changes needed	Connectivity incorporated into proposed action and subsequent action alternatives
HEI not relevant (BOI)	Amendment of forest plan if this objective cannot be met.	Comment considered but no changes needed	
Elk Security (ODFW)	Address intent of new forest plan	Comment considered but no changes needed	
<b>Botany</b>			
Complete new surveys in every unit (GHCC)	Disclose effects from the project to identified botanical, moss, bryophyte and fungi	Analysis supplemented, improved or modified	Fungi surveys were completed

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<b>Silviculture</b>			
Diseased trees and mistletoe (GHCC)	Create an alternative to leave diseased trees, and if alternatives propose to remove diseased trees FS should address effects to future snag retention	Comment considered but no changes needed	Snag retention analyzed in the EA
Treatment Return Interval (BOI)	Treat more aggressively for anticipated delay in return interval (>10yrs).	Comment considered but no changes needed	
Silv Rx (OW)	Provide clear descriptions in analysis	Analysis supplemented, improved or modified	
HRV and Landscape heterogeneity (BOI)	Supportive of analysis based on HRV and stand heterogeneity, use variable density thinning	Comment considered but no changes needed	
<b>Climate Change</b>			
Cumulative impact of project on CC (GHCC)	Disclose effects to project contribution	Analysis supplemented, improved or modified	See climate change analysis in the EA
Carbon Storage (OW)	Adopt alternative that maintains and increases carbon storage in ecosystem	Comment considered but no changes needed	This is a purpose and need item. All alternatives are designed to improve the carbon balance.
<b>Undeveloped lands</b>			
Unroaded areas (OW)	Consider an alternative that proposes only non-commercial veg mgt and rx fire within all IRAs and	Additional alternatives developed and evaluated	Considered, not analyzed in detail

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	uninventoried roadless areas		
<b>Grazing</b>			
Impacts from logging and grazing (GHCC)	Create alternative that reduces grazing after logging and burning	Comment considered but no changes needed	Not an issue that can be addressed within the scope of this project
<b>Fuels</b>			
Transference of Risk (BOI)	Consider how our treatments affect landowners in project area	Comment considered but no changes needed	
Fire risk to homes (OW)	Treat only around homes, not in other forested areas	Comment considered but no changes needed	